

CASE NO. PD-0322-21

*TO THE COURT OF CRIMINAL APPEALS
OF THE
STATE OF TEXAS*

FILED
COURT OF CRIMINAL APPEALS
11/17/2021
DEANA WILLIAMSON, CLERK

**SAMUEL CRAWFORD PATTERSON,
Appellant**

V.

**STATE OF TEXAS,
Appellee**

ON APPEAL FROM THE COURT OF APPEALS
FOR THE TENTH JUDICIAL DISTRICT, WACO, TEXAS
CAUSE NO. 10-19-00243-CR

APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE BRIEF

SAMUEL CRAWFORD PATTERSON, Appellant, files this Motion for Extension of Time to File Brief and would show the Court the following:

On December 9, 2020 the Tenth Court of Appeals in Waco, Texas issued their Memorandum Opinion in Cause No. 10-19-00243-CR, *Samuel Crawford Patterson v. State of Texas*, reversing the Trial Court Judgment. The State filed a Motion for Rehearing on January 4, 2021. The Tenth Court of Appeals denied the State’s Motion for Rehearing on April 28, 2021.

The State filed their Petition for Discretionary Review (“PDR”) on May 12, 2021. On September 15, 2021 this Court granted the State’s PDR and set briefing

deadlines. The State filed their Brief on the Merits on October 15, 2021. The deadline to file Appellant's Brief on the Merits is November 15, 2021.

Since the filing of the State's Brief on the Merits, Counsel has been involved in the following:

- *State of Texas v. Desiderio Gonzales, Jr.*, Cause No. 17-00458-CRF-85, 85th District Court of Brazos County Texas – a Continuous Sexual Abuse case that was preferentially set for Jury Trial on Monday, October 11, 2021. Counsel was in trial on this case for 6 trial days. Trial preparation throughout the 30 days prior to October 11, 2021, including the weekend of trial, October 16 and 17, 2021;
- *Joe Luis Becerra v. State of Texas*, Cause No. 10-17-00143-CR, 10th Court of Appeals, Waco, Texas – Preparation for, travel to Waco and appearance at Oral Argument held October 20, 2021;
- Out-of-state vacation scheduled with filed vacation letter for the days of October 29 through November 8, 2021;
- *Kevin Wayne Deggs v. State of Texas*, Cause No. 10-20-00068-CR, 10th Court of Appeals, Waco, Texas – Preparation for and appearance at Oral Argument held November 10, 2021;
- *Holden Douglas Crucet v. State of Texas*, Case No. 10-21-00106-CR, 10th Court of Appeals, Waco, Texas – Drafting and legal research for Brief due on November 29, 2021.

Appellant requests an additional thirty (30) days in which to file his Brief on the Merits with the Court of Criminal Appeals. The Brief will be due on **Wednesday, December 15, 2021**. This is Appellant's first request for an extension of time to file his Brief.

THEREFORE, Appellant requests the following:

1. Extension of thirty (30) days to **Wednesday, December 15, 2021** to file the Appellant's Brief on the Merits;
2. General relief.

RESPECTFULLY SUBMITTED,

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Certificate of Service

I certify that a true and correct copy of this Motion for Extension of Time to File Brief was forwarded to counsel of record listed below via electronic filing on the 15th day of November, 2021:

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